

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Case No. 3:11-CR-00153-RJC-DCK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

HAI VAN NGUYEN and
OANH THI LE,

Defendants.

**DEFENDANT OANH THI
LE'S PROPOSED VOIR
DIRE**

COMES NOW Defendant Oanh Thi Le, through undersigned counsel and hereby submits the following proposed questions for the jury panel, in addition to those generally asked by the Court:

Familiarity with Defendants' family

1. Do any of you know any of the Defendants' children, seated behind defense table:
 - a. David Nguyen, who is a pharmacist at Walgreens in Concord, North Carolina.
 - b. Tony Nguyen, who lives in Greensboro, is a member of the Army National Guard, and is enrolled in the Master's program at A&T University.

- c. Randy Nguyen, who lives in Belmont, North Carolina and works with Freight Line Trucking.
- d. Kathy Nguyen, who lives in Greenville, North Carolina, and attends Eastern Carolina University.
- e. Van Thi Nguyen, who lives in Charlotte, works at Carolina Medical Center and attends UNC-Charlotte's nursing program.

Experience with Vietnam/Vietnamese/Immigrants in general

- 2. Both Hai Van Nguyen and his wife, Oanh Thi Le, are from Vietnam. They are legal immigrants who have been in this country since 1980. Do any of you have any personal experience dealing with people of Vietnamese descent? If yes, please describe.
 - a. Any professional experience dealing with people of Vietnamese descent?
If yes, please describe.
- 3. Do any of you have any particular feelings about Vietnam or the Vietnamese people that may influence how you listen to the evidence in this case? If yes, please describe.
- 4. Does anyone have any familiarity with Vietnamese customs and habits generally?
If yes, please describe.
- 5. Does anyone have any familiarity with Vietnamese traditions as it relates to family? If yes, please describe.
- 6. Does anyone have any particular feelings about immigrants in general that may affect how you listen and assess evidence in this case? If yes, please describe.

7. Does anyone have any experience in working with immigrants in general?

a. Any personal experience with immigrants? If yes, please describe.

Experience with banks/bank tellers

8. The banking industry has changed dramatically over the past couple of decades – has anyone had the experience of dealing with a personal banker face-to-face? If yes, please describe.

9. Is there anyone who generally goes into a bank to deposit or withdraw money, as opposed to using the ATM or drive through window for transactions?

a. If yes, any particular reason for doing banking in person as opposed to doing banking through more automated services?

RESPECTFULLY submitted this the 27th day of March, 2012.

RUDOLF WIDENHOUSE & FIALKO

/s/ David S. Rudolf

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Attorneys for Oanh Thi Le

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I served the foregoing **Defendant Oahn Thi Le's Proposed Voir Dire** was served electronically through ECF filing upon:

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RESPECTFULLY submitted this the 27th day of March, 2012.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I served the foregoing **Defendant Oahn Thi Le' Proposed Voir Dire** was served electronically through ECF filing upon:

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